Dear FCC,I am sure you have been overwhelmed with email on this Amateur Radio Petition

for Rule Making. I have a few comments that I hope will be worthy of your time and consideration.

The 'number one' issue I see with this proposal is the lack of 'Upgrade Incentives'. If a entry level license is required, and I think it is, then it should be an ENTRY level license, not a stopping place for those who are not really interested in Amateur Radio.

A short background.

The Novice class of the 50's and 60's was the most successful Beginners license ever conceived. Why was it a success (?) It had a time limit, one year, later extended to two years. It was a true beginner's license, the newcomer had one year to progress forward, otherwise the license expired. Those who were interested in Amateur Radio, did what was required to move to a permanent higher class license. When the time limit was changed to 10 years and renewable, those with no incentive stayed novices. This is apparent by the number of inactive novice class licensees still in your database.

The TIME LIMIT, was the key incentive to encourage new amateur's to learn and get moving. This is the one important point not incorporated in this Petition for Rule Making. As I see it, regardless of any other ideas and factors, any new 'BEGINNERS' license class must have a unmistakable , and urgent need for self improvement. Whether this includes CW isn't the question, Beginners should progress to higher levels of understanding and expertises.

If the Amateur Radio service is to survive, we need a licensing structure that demands excellences , not complacency.

Faults with this Proposal, and a quick solution

- 1. It does not limit the duration of the Novice license. Limit the Novice to one year.
- 2. it implies the present Technician entry-level examination is "overly complex,". This couldn't be farther from the truth. Hundreds of thousands of people have successfully past this "overly complex" test. If anything make it more complex. How simple does it need to be?
- 3. the frequency spectrum and privileges offered in this "novice" license are way too generous. There will be NO incentive to advance. Make this a beginners license, be more frugal with the privileges.
- 4. There is no reason the present Technicians or Technician + license classes should be 'bumped' up to the general class. If they want No-Code HF , let them become a Novice.
- 5. The idea beginners shouldn't learn and understand the concept that RF is dangerous, is just asking for trouble, and to limit the power 50 watts is unrealistic. Most present equipment has an output of 100 watts on 28, 50 & 144 mHz. Why would anyone expect the licensee to reduce his power when he doesn't understand the effects RF Exposure could pose

Summary, I feel this proposal has merit, it is too generous for a beginners license. Limit the duration of the new entry license to encourage advancement,

not stagnation. Limit the spectrum to a Taste of HF, again to encourage advancement. Leave the present Technician and Tech+ license alone, no auto advancement is required. Combine the Advanced and Extra into one license requiring 5wpm CW.

Sincerely Yours John Wilson